

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No.: 1:19-cv-12551 FDS

**DECLARATION OF ANDREW BRUNS IN SUPPORT OF MOTION TO STAY PENDING  
*INTER PARTES* REVIEW**

I, Andrew Bruns, declare and state as follows:

1. I am an attorney licensed to practice law in the State of California and admitted to practice before this Court. I am an attorney at the law firm of Keker, Van Nest and Peters, LLP and counsel for Defendant Google LLC, (“Google”) in the above-captioned action.
2. I make this Declaration in support of Google’s Motion to Stay Pending *Inter Partes* Review. I have personal knowledge of the facts stated herein and, if called as a witness, I could testify to them competently under oath.
3. Attached as **Exhibit 1** is a true and correct copy of Google’s IPR Petition IPR2021-00164 related to Patent No. 9,218,156, filed November 5, 2020.
4. Attached as **Exhibit 2** is a true and correct copy of Google’s IPR Petition IPR2021-00165 related to Patent No. 9,218,156, filed November 5, 2020.
5. Attached as **Exhibit 3** is a true and correct copy of Google’s IPR Petition IPR2021-00178 related

to Patent No. 8,407,273, filed November 6, 2020.

6. Attached as **Exhibit 4** is a true and correct copy of Google's IPR Petition IPR2021-00179 related to Patent No. 8,407,273, filed November 6, 2020.

7. Attached as **Exhibit 5** is a true and correct copy of Google's IPR Petition IPR2021-00154 related to Patent No. 10,416,961, filed October 30, 2020.

8. Attached as **Exhibit 6** is a true and correct copy of Google's IPR Petition IPR2021-00155 related to Patent No. 10,416,961, filed October 30, 2020.

9. Attached as **Exhibit 7** is a true and correct copy of Notice Ranking Petitions and Explaining Material Differences filed with Google's IPR Petition IPR2021-00154, dated October 30, 2020.

10. Attached as **Exhibit 8** is a true and correct copy of the Notice of Filing Date Accorded to Google's IPR Petitions IPR2021-00154 and IPR2021-00155, dated November 13, 2020.

11. Attached as **Exhibit 9** is a true and correct copy of the PTAB Decision in *Sand Revolution II, LLC v. Continental Intermodal Group – Trucking LLC*, IPR2019-01393, dated June 16, 2020.

12. Attached as **Exhibit 10** is a true and correct copy of a letter from Matthias Kamber to Paul Hayes, dated November 11, 2020.

13. Attached as **Exhibit 11** is a true and correct copy of an email from Kevin Gannon to Matthias Kamber, dated November 13, 2020.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed November 16, 2020, at Portland, Oregon.

By: /s/ Andrew Bruns  
Andrew Bruns

**CERTIFICATE OF SERVICE**

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

Date: November 16, 2020

/s/ Nathan R. Speed

Nathan R. Speed